

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

OPAL WORDS,

Plaintiff,

Vs.

Walgreens Pharmacy (Missouri)
Walgreens Pharmacy (Kansas)
Activis/Watson Pharmaceutical //MFG
Sharon Lee, M.D.
Parr Pharmaceutical / MFG DEFENDANTS
Kansas Medicaid
Viola Riffin
St. John's Hospital
Vernita D. Harriston-Mitchell, M.D.
Danielle Flannigan
Katie L. Zerbe
DICK DUNFEE ARNP

Case No. 14-464-CV-W-ODS

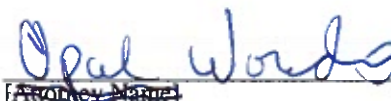
PLAINTIFF'S AMENDED COMPLAINT

Comes now Plaintiff Opal Words, ProSe with her Amended complaint, states as follows:

- Walgreens (Missouri/Kansas) were negligent and careless in relating and receiving phone calls regarding prescription drugs.
- Negligent and careless in filling prescriptions.
- Negligent and careless in catching the doctor's mistakes (if any).
- Negligent and careless in watching for increase in dosage (Narcotic).
- Negligent and careless in terms of communication between the doctor and the pharmacist.
- Negligent and careless in checking for amount of medications that are within the DEA/FDA Approval.

- Failed to follow instructions of the manufacturer regarding overdose on prescriptions (if any).
- Negligent and careless in filling four prescriptions and none were caught.
- Failed to provide a drug description (color or shape) of pill Dated 6/1/2012
- Sharon Lee, M.D. Failed to failed to collect blood samples.
- She also failed to make clear information regarding the amount of medication dosage.
- She failed to prescribe within the DEA/FDA law.
- She failed to follow-up with the Neurologist regarding RSD and how to treat it.
- Doctor Hairston-Mitchell failed to prescribe Marinol according to the patient's weight.
- She also failed to pass information to the ^{DR. SHARON LEE M.D.}Neurologist as was necessary.
- Activis/Watson Pharmaceutical failed to enter a recommendation to prevent overdose.
- This company also failed to inform the pharmacy of how to prevent overdose.
- Par Pharmaceutical failed to enter a recommendation to prevent overdose.
- This company also failed to inform the pharmacy of how to prevent overdose.
- Kansas Medicaid over-sighted four prescriptions of Marinol that were more than DEA/FDA approved.
- Viola Riggin was inattentive towards patient's records regarding her weight and her medication.
- Viola also failed to regulate health-care issues.
- St. John's Hospital released patient after knowing that the patient had overdose drug reaction, two hard pains to her heart, and also the D/Dimer indicated blood clotting on 11/08/2012.
- Also this hospital failed to keep patient under observation on 11/08/2012.

- This hospital also failed to report, chart, or record the trauma to the patient's arm during the preparation of treatment on 11/09/2012.
- On 11/09/2012 the patient received a phone call from the E.R. She went to the hospital to discuss the phone call, in which case the hospital told the patient that treatment needed to be done in regards to the medicine the patient had been taking which indicated a blood clot on the order of Derrick Thomas and "we do not want to see what happened to him, happen to you." On the same date the hospital issued the patient an Arteriogram.


[Printed Name]

Citizenship of Defendants.

Sharon Lee, M.D./ Family Health Care

530 Quindaro,

Kansas City, Kansas

66107

And/or

340 SW Boulevard,

Kansas City, Kansas

66103

Vernita D. Hairston-Mitchell, M.D.

K.U. Medical Center

Kansas City, Kansas

Viola Riggin, Director of HealthCare Services.

Landon State Building

900 Jackson (4th Floor)

Topeka, Kansas

66612

Walgreens Pharmacy (Danielle Flannigan)

2301 Holmes

Kansas City M.O.

64108

Walgreens Pharmacy (Katie L. Zerbe)

2900 S. 4th St.

Leavenworth, Kansas

66048

Par Pharmaceutical
300 Tice Boulevard
Woodcliff Lake, New York
07677

Activis/Watson Pharmaceutical
400 Interpace Pkwy
Parsippany, New Jersey
07054

K.S. Medicaid
503 S. Kansas
Topeka, Kansas
66603

St. John's Hospital
3500 S. 4th St.
Leavenworth, Kansas
66048

Amount of Damages That the Plaintiff Seeks:

Past Pain and suffering, Future pain and suffering due to the negligence and careless-ness of health-care providers, past medical, future medical, mental anguish, Pharmacophobia due to the negligence of the health-care providers. Estimated Sum of the amount from each provider: \$500,000.

"Hardship"

I understand that a false statement or answer to any question in this affidavit will subject me to penalties of perjury.

x Opal Woods
Signature of Plaintiff

VERIFICATION

State of Missouri)
County of Buchanan)

I, being first duly sworn under oath, state that I know the contents of this affidavit and that the information contained in the affidavit is true to the best of my knowledge and belief.

Opal Woods
Signature of Plaintiff or Plaintiffs

All parties must verify

SUBSCRIBED AND SWORN TO before me this 10th day of June, 20 14

Elizabeth Broadus
Notary Public

1-26-18
My Commission Expires

